

ASSESSMENT OBSERVATIONS

The property inspection was conducted on December 7, 1993, and consisted of a walk along the length of the site, with adjacent properties being viewed from the subject site. The inspection focused on potential environmental release points and visual observation for the presence of any evidence of onsite contamination.

This section is based upon information provided by the visual inspection and a personal interview with Dick Anderson of the MDOT Real Estate Division. Mr. Anderson manages the railroad rights-of-way for MDOT and has been familiar with the site since it was purchased by MDOT in 1984.

Chemical Materials

Mr. Anderson was unaware of any chemical storage or spillage occurring onsite.

Piles of blue hides were observed in the railroad right-of-way approximately 50' north of Rum Creek (see Appendix 6, Site Photographs and Appendix 4, Site Map). Plastic sheeting that covered the hides was torn or missing on several of the piles. Additional hide piles were observed approximately 300' north of Rum Creek. Brown, odorous, organic wastes which appeared to contain animal hair were observed immediately east of the south hide pile and also approximately 500' north of Rum Creek (see Appendix 4, Site Map). WWW tannery wastes have contained lead, zinc, nickel, cadmium, chromium, and acetone.

A portion of a wooden trailer containing hides was located onsite approximately 550' north of Rum Creek (see Appendix 4, Site Map). Yellow-brown staining was observed beneath the south end of the trailer, which appears to be approximately 10' west of the site (see Appendix 6, Site Photographs).

A dumpster was observed on WWW property immediately east of the subject site, opposite the WWTP. A yellow-brown stain was observed on soil beneath the dumpster that appeared to extend onto the subject site. The stained area was approximately 1' x 3'. The interior of the dumpster could not be viewed. A worker at WWW stated that he believed the dumpster was used to store metal but was uncertain.

An area of limited soil staining (approximately 4' x 2.5') was observed in the gravel parking area between the WWTP and the tannery in the southern portion of the site (see Appendix 6, Site

Photographs). The stain did not appear to penetrate more than approximately 2" into the soil (i.e., no soil staining or odors were noted below 2").

Patches of black soil were observed in the parking/drive area near the south end of the site and onsite near the north end of the tannery building (see Appendix 6, Site Photographs). The soil was darker than surrounding soils. A petroleum odor was not detected in this material. Peat-like soils are reported less than 10' below ground level (bgl) in the area.

PCB Inspection

PCBs were used as a coolant/dielectric fluid in transformers and capacitors from 1929 to 1977. No electrical transformers were observed on the subject site. Three elevated, electrical transformers were observed along the west side of WWW, immediately south of Rum Creek. According to a 1987 WWW Pollution Incident Prevention Plan, one of the transformers has a PCB concentration between 162 and 362 ppm. Two other PCB-containing transformers are located at the WWW power house, also east of the site. No evidence of leaks or release of any insulating oil was observed during the site inspection or discovered in review of MDNR files.

Solid Waste

Broken concrete, brick, scrap wood, and metal were observed onsite, along the riverbank, from approximately 50' to 700' north of the wooden trailer (see Appendix 4, Site Map).

Cinder and slag-like materials were observed piled along the railroad bed in two locations approximately 1400'-1700' north of Rum Creek (see Appendix 4, Site Map). Most of the ground in the area was covered with leaves and was not easily visible at the time of the inspection.

An open-top 55-gallon drum was observed onsite approximately 75'-100' south of the northern property boundary, near the eastern edge of the site. Another drum, wooden pallets, and scrap metal were observed in the area, northeast of the site, on property formerly operated by American Oil Company (see Appendix 4, Site Map). It appears that surface water runoff from this area northeast of the site flows to the southwest and ponds onsite, east of the railroad tracks. No obvious soil staining, petroleum odors, or surface water sheen were noted in the area during the site inspection.

Storage Tanks

Mr. Anderson was unaware of any present or former ASTs or USTs located on the property.

An unidentified vertical, orange pipe and an empty 55-gallon drum were observed at the eastern edge of the railroad right-of-way immediately south of Rum Creek (see Appendix 6, Site Photographs). Mr. Anderson did not know the origin or purpose of the pipe or drum. They are in the vicinity of a monitor well installed as part of an UST investigation at WWW and appear to simply mark the location of the flush-mount monitor well. The pipe was loose and did not appear to be connected to anything.

Wastewater

No evidence of onsite disposal of wastewater was observed during the site inspection.

Tannery effluent generated at the adjacent WWW is pretreated in the WWTP immediately west of the site. Treatment consists of primary clarification with extended aeration; a chemical treatment with lime, alum, sodium hydroxide, and polyelectrolytes; a final clarification; and sludge dewatering. The wastewater is then discharged to the municipal sanitary sewer system.

REGULATORY REVIEW

FTC&H requested a review of files located at the Grand Rapids Office of the MDNR for the Environmental Response, Surface Water Quality, Waste Management, and Air Quality Divisions. Files were also requested from the Kent County Health Department, Grand Rapids, Michigan, and the Michigan State Police Fire Marshal Division, Lansing, Michigan.

In addition to the site itself, FTC&H requested a file search for:

1. Wolverine World Wide, Courtland and Main Streets
2. Michigan Northern Railroad/Penn Central Railroad
3. Porter's Quarters Gifts, 31 Courtland Street
4. S&J Petroleum Corporation, 66 East Bridge Street (LUST site)
5. City of Rockford Department of Public Works, 200 Industrial Drive

Agency Review

1. The Kent County Health Department had no information on any of the listed sites.
2. The MDNR had information on the following sites.
 - a. Wolverine World Wide, 123 Main Street:
Waste Management Division: A January 1984 Resource Conservation and Recovery Act inspection revealed this facility used IPA, MIBK, butyl acetate, mineral spirits, and EP solvent (a blend from Spartan). A maximum of one to two drums of hazardous waste was generated per month. A 1982 waste characterization report states that sampled wastes contained lead, zinc, nickel, cadmium, chromium, and acetone. The plant has a wastewater treatment facility for tannery effluent. The treatment facility generates chromium-bearing sludge.

 Pollution Incident Prevention Plans on file for WWW state that flammable materials, including MIBK and IPA, were being stored outside, west and north of the warehouse, which is the southernmost WWW building (see Appendix 4, Site Map). The exact locations were not determined. Information in the file indicates the chemical storage area was later moved inside the warehouse, which has containment.

A tin storage shed north of Rum Creek and west of the railroad site had a compacted earthen floor and was used to store hydraulic oil (see Appendix 4, Site Map). MDNR notes indicate no evidence of leakage was observed outside the tin shed.

A February 1983 inspection revealed wastes were being stored in a building with no roof that was attached to the shoe plant, located northeast of the site, approximately 500'.

Environmental Response Division: Closure of three gasoline USTs began at the WWW site in October 1992. There were two 1000-gallon USTs and one 4000-gallon UST. One of the 1000-gallon USTs was located on the west side of the facility, near the wastewater treatment plant, approximately 200' south of Rum Creek and approximately 20'-30' east of the subject site. The other two USTs were south of the power house approximately 100'-150' east of the subject site (see Appendix 4, Site Map). Soils were stained and had a petroleum odor during closure activities. No BTEX was discovered in the western excavation above Type B cleanup criteria. The BTEX contamination did not extend to the groundwater. Groundwater was 5'-9.5' bgl and flowed from northeast to southwest, toward the river. Elevated levels of lead were discovered in the soils in the vicinity of the western excavation. Lead at 23 ppm was detected in soils approximately 5' bgl at the eastern edge of the subject site, 75' south of Rum Creek. The default Type A soil cleanup criteria is 21 ppm. A soil-lead concentration of 1400 ppm was detected approximately 20'-30' east of the site and approximately 100' south of Rum Creek. This level exceeds the direct contact criteria for lead of 400 ppm. A lead level of 130 ppm was detected at 4'-6' bgl in a boring approximately 200' south of Rum Creek and 20'-30' west of the site. In the southern excavation, the concentration of BTEX in the groundwater was below Type B criteria. Soil excavation was recommended for the southern area. An April 1993 report by FTC&H, *Hydrogeologic Investigation Report and Proposed CAP*, was submitted to the MDNR.

Three other USTs were removed from WWW in 1988. They included a 12,000-gallon gasoline UST, a 2,000-gallon diesel UST, and a 900-gallon diesel UST. A letter from WWW to the MDNR states that no evidence of leakage was noted during removal of the USTs. It does not appear that a site assessment was conducted and locations for these USTs were not discovered in the file.

In January 1980, foam from the WWTP aerator overflowed. Affected soil was hauled to a landfill.

Surface Water Quality Division: In September 1981, a complaint was received regarding a discharge of sludge to Rum Creek during dewatering activities for construction. The MDNR instructed the company to pump the dewatering water through the treatment system. No further action was required.

In November 1982, approximately 2000 gallons of tannery waste were released to Rum Creek due to a plugged transfer line. No harmful effects were noted by the MDNR representative.

In 1991, WWW requested a withdrawal of a groundwater discharge permit because the facility connected to the sanitary sewer system.

Air Quality Division: In September 1991, the MDNR registered a complaint regarding "misting" of an outdoor opening to the sludge press at the WWTP building with bleach to control odor. The MDNR inspector noted potential soil contamination in a localized area. No further response was undertaken. That same month, the MDNR issued a letter to WWW regarding a problem with visible emissions from a scrubber stack and spray booth on a leather coating line.

- b. Rockford Parking Area (Act 307 site), approximately 800' south of the site. Hydrocarbon contamination was discovered at this site during installation of a drainage line. A hydrocarbon bulk storage facility previously operated at this location. An August 1992 *Hydrogeological Investigation* conducted by FTC&H indicates that soil and groundwater contamination has not migrated offsite. Groundwater flow direction in this area appears to be to the west-southwest, toward the Rogue River. FTC&H recommended that a Corrective Action Plan be prepared for the site. No additional work has been conducted at the site.
- c. City of Rockford Department of Public Works, 200 Industrial Drive, approximately 900'-1000' northeast of the site (LUST site). According to Mike Chesher, Rockford City Public Services Director, soil and groundwater was contaminated due to leaking gasoline tanks. The contamination has not migrated offsite. He stated that a proposal for groundwater treatment has been submitted to the MDNR and that contaminated soils have been remediated.

3. The Fire Marshal Division had no information on any of the listed sites.

Data Base Review

FTC&H also reviewed the following data bases of sites compiled by the federal and state government.

Federal

1. The National Priorities List of CERCLA (Superfund) Sites was reviewed for known sites of contamination located within approximately one mile of the subject site. No sites were located.
2. The Comprehensive Environmental Response, Compensation, and Liability Information System List was checked for sites within a 1/2-mile radius of the subject site. No sites were found.
3. The Emergency Response Notification System List was reviewed for the presence of the subject property; the subject site was not recorded.

State

1. The June 1993 Michigan List of Hazardous Waste Generators was reviewed for the site and adjacent properties. The only site listed was Wolverine World Wide Inc., 123 Main Street and 9341 Courtland Street.
2. The November 1993 Proposed List of Michigan Sites of Environmental Contamination (MDNR Act 307 List) was checked for known sites of contamination within approximately one mile of the subject site. The following sites were found.
 - a. Rockford Paper Mills, 41-08N-11W-02DD, approximately one mile southwest on the opposite side of the Rogue River. Aluminum and sodium were released to the environment. Evaluation and interim response are privately funded.
 - b. Rockford Parking Area, 41-09N-11W-36, approximately 800' south of the site. Benzo(a)anthrene was released to the environment. Evaluation and interim response are privately funded (refer to Agency Review paragraph 2.b.).

3. The Fiscal Year 1993 Fourth Quarterly Report of Leaking UST Sites in Michigan was reviewed for known sites of contamination within approximately 1/2-mile of the subject site. The following sites were located.
 - a. J&J Petroleum Corporation, 66 East Bridge Street, approximately 550' southeast of the site. This site appears to be in a downgradient groundwater flow direction from the subject site and thus contamination is not likely to affect the subject site.
 - b. Wolverine Leathers, 123 North Main Street, adjacent to the site (refer to Agency Review paragraph 2.a.).
 - c. City of Rockford Department of Public Works, 200 Industrial Drive, approximately 900'-1000' northeast of the site (refer to Agency Review paragraph 2.c.).
4. The September 1993 List of Registered USTs in Michigan was reviewed for the presence of registered USTs onsite and on adjacent properties. The only site listed was Wolverine Leathers, 123 North Main Street. The list indicates that three gasoline USTs (two 2000-gallon and one 4000-gallon) are temporarily closed (refer to Agency Review paragraph 2.a.).
5. The March 1993 MDNR List of Active Solid Waste Facilities, Transfer Stations, and Inactive Solid Waste Facilities was checked for known disposal sites within a 1/2-mile radius of the subject site. No sites were located.
6. The Michigan List of Hazardous Waste Treatment, Storage, and Disposal Facilities was checked for sites within a 1-mile radius of the subject site. No sites were found.

CONCLUSIONS

There are three known sites with leaking USTs located within a 1/2-mile radius of the subject site and two Act 307 sites of contamination located within a 1-mile radius. From the information reviewed, it does not appear likely that contamination from any of these sites has the potential to impact the subject property.

After reviewing the information provided by a 50-year title search; reviewing MDNR, local health department, and Fire Marshal Division files; conducting a visual site inspection; interviewing the current owner/operator; reviewing state and federal lists of contaminated sites; and reviewing adjacent properties; FTC&H personnel, with the information available, have identified the following as areas of potential environmental contamination:

1. Cinders and slag-like material observed along the path of the railroad may have leached contaminants, such as heavy metals and polynuclear aromatic hydrocarbons, to the soil or groundwater beneath the site.
2. Hides and/or wastes stored onsite north of Rum Creek may have leached contaminants, such as heavy metals, to the soil or groundwater beneath the site.
3. Staining was observed onsite adjacent to an unidentified WWW dumpster. The staining appeared similar in color to that observed beneath a hide storage trailer.
4. Elevated lead levels were detected in soils east and west of the former railroad tracks in the vicinity of the former WWW USTs. The concentrations were greater than background levels of MDNR Type A cleanup criteria. Elevated lead levels may exist onsite in this area.
5. Assessor records indicate that American Oil Company formerly operated immediately north of the site. Surface water drainage and probable groundwater flow direction is toward the subject site. No visual evidence of environmental contamination was found.
6. Chemical materials have been stored outside at the adjacent WWW warehouse building east of the site. There is no available evidence to indicate that environmental contamination has resulted from this storage.

Soil staining in the parking area between WWW and the WWTP appears to be confined to the upper few inches of soil.